

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NANCY GILL,

Plaintiff,

VS.

MICHAEL MAGAN, MICHAEL GONZALEZ,
TIMOTHY RENIHAN, CITY OF SEATTLE,

Defendants.

Case No. 2:19-cv-00860-MJP

DECLARATION OF DARRYL PARKER IN
SUPPORT OF PLAINTIFF’S MOTION FOR
ORDER

I, Darryl Parker, declare:

1. I am an active member of the Washington State Bar and am admitted to practice before this court. I am the founder of the law firm of Civil Rights Justice Center, PLLC, and am counsel of record for plaintiff Nancy Gill herein. I submit this declaration in support of plaintiff's Motion for Order requesting King County Correctional Facility inmate call records. I have personal knowledge of the following facts.

2. On August 25, 2020, I sent a formal public records request to King County using my online Public Records System account, requesting the phone call records for King County

1 Correctional Facility inmate Steven Fisher, including the name, phone number, and address of each
2 person Mr. Fisher called.

3 3. On August 27, 2020, I received a phone call from Michael Vernon with the
4 Department of Adult and Juvenile Detention for King County to discuss the public records request.
5 I then received a follow-up email at 11:04 a.m. from Mr. Vernon stating that they were in receipt of
6 the public records request and were responding to it on behalf of the King County Executive Branch
7 per King County Code 2.12.005 and 2.12.230(B), assigning the request tracking number I000134-
8 082520. The email proceeded to state that, pursuant to RCW 70.48.100, they could not release
9 inmate records, including booking photos, to anyone other than the inmate, their attorney or to a law
10 enforcement agency, and in order to release the requested records they needed a court order signed
11 by a judge.

12 4. The call records of inmate Steven Fisher from King County Correctional Facility,
13 and any contact information for all persons Mr. Fisher made calls to, are pertinent. Defendants were
14 listening to the calls Mr. Fisher made while at King County Correctional Facility, so the call records
15 of Mr. Fisher will address the issue as to what personal contact information, including his home
16 address, Mr. Fisher gave to the jail staff and Defendants, as well as the issue of what address the jail
17 actually had for Mr. Fisher in its records prior to defendants executing a search warrant on Plaintiff's
18 home. The call records of Mr. Fisher will further give details of any information Defendants learned
19 by listening to Mr. Fisher's phone calls prior to executing the search warrant on Plaintiff, including
20 any mentions Mr. Fisher or the caller on the other end made about where Mr. Fisher and his mother
21 were living.

1 I declare under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct.

3 Executed this 9th day of September, 2020 at Seattle, Washington.

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6 _____
7 Darryl Parker
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CERTIFICATE OF SERVICE

I, Paulina Andrews, under penalty of perjury under the laws of the State of Washington, declare as follows:

I am a legal assistant at the Civil Rights Justice Center, PLLC, and am over the age of 18. On the date in the manner indicated below, I caused the foregoing DECLARATION OF DARRYL PARKER IN SUPPORT OF PLAINTIFF'S MOTION FOR ORDER and this CERTIFICATE OF SERVICE to be electronically filed with the Clerk of the Court using CM/ECF system which will send notification of the filing to all counsel of record.

DATED this 9th day of September, 2020, at Seattle, Washington.

s/ Paulina Andrews

Paulina Andrews, Legal Assistant